DWSF 12.3.74 v.2





PUGET SOUND FREIGHT LINES • TRUCK LINES

JUL 2 8 2008

Environmental Cleanup Office

P.O. Box 24526

Seattle, Washington 98124-0526

Phone 206/623-1600

FAX 206/621-7793

July 25, 2008

United States Environmental Protection Agency, Region 10 Claire Hong, Remedial Project Manager Office of Environmental Cleanup, ECL-111 1200 Sixth Avenue Seattle, WA 98101

Re: General Notice of Potential Liability Pursuant to Section 107(a) and Request for Information Pursuant to Section 104(c) of CERCLA, for the Lower Duwamish Waterway Superfund Site, Seattle, Washington and sent to representatives of Puget Sound Truck Lines, Inc. on March 25, 2008.

Dear Ms. Hong,

Enclosed you will find responses to the above referenced General Notice and documents to support those responses.

In addition, and per our telephone conversation on July 24, 2008, you have granted us a further extension of forty-five (45) days to locate additional documents and records that were relocated and/or misplaced during our recent move of our corporate office in late February and completed as of March 1, 2008.

Please reference our letter requesting an extension to the original deadline on May 9, 2008 for a detailed explanation for our continuing records search frustrations.

If there are any question please feel free to call.

Respectfully.

Gerry Henson

Director of Information Systems Puget Sound Freight Lines P. O. Box 24526 3480 West Marginal Way SW Seattle, WA 98124

RECEIVED

JUL 2 8 2008

Environmental Cleanup Office

U.S. EPA

CERCLA SECTION 104(e)

INFORMATION REQUEST

Respondent: Representative of Puget Sound Truck Lines, Inc.

c/o Julie E. Dickens

Site: Lower Duwamish Waterway, Seattle WA

Puget Sound Truck Lines, Inc.

7303 8th Ave. S Seattle, WA 98108

King County Parcels: 2136200681

2136200670

Date: 1937 to present

Please note: this Information Request includes instructions for responding to this request and definitions of words such as "Respondent," "Site," and "identify" used in the questions.

INFORMATION REQUEST QUESTIONS

1. Respondent Information

- a. Provide the full legal name and mailing address of the Respondent.
- b. For each person answering these questions on behalf of Respondent, provide:
 - i. full name:
 - ii. title:
 - iii. business address; and
 - iv. business telephone number and FAX machine number.
- c. If Respondent wishes to designate an individual for all future correspondence concerning

- this Site, please indicate here by providing that individual's name, address, telephone number, and fax number.
- d. State the dates during which Respondent held any property interests at or within one-half mile of the above mentioned address.
- e. State the dates during which Respondent conducted any business activity at or within one-half mile of the above mentioned address.
- f. Describe the nature of Respondent's business activities at the above mentioned address or within one-half mile of that address.
- g. In relation to your answer to the previous question, identify all materials used or created by your activities at the above mentioned address, including raw materials, commercial products, building debris, and other wastes.
- h. If Respondent, its parent corporation, subsidiaries or other related or associated companies have filed for bankruptcy, provide:
 - i. the U.S. Bankruptcy Court in which the petition was filed;
 - ii. the docket numbers of such petition;
 - iii. the date the bankruptcy petition was filed;
 - iv. whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or other provision; and
 - v. a brief description of the current status of the petition.

2. Site Activities and Interests

- a. Provide all documents in your possession regarding the ownership or environmental conditions of the property mentioned above, including, but not limited to, copies of deeds, sales contracts, leases, blueprints, "as-builts" and photographs.
- b. Provide information on the condition of the property when purchased; describe the source, volume, and content of any fill material used during the construction of the buildings, including waterside structures such as seawalls, wharves, docks, or marine ways.
- c. Provide information on past dredging or future planned dredging at this site.
- d. Provide a brief summary of the activities conducted at the site while under Respondent's

ownership or operation. Include process diagrams or flow charts of the industrial activities conducted at the site.

- e. Provide all documents pertaining to sale, transfer, delivery, disposal, of any hazardous substances, scrap materials, and/or recyclable materials to this property.
- f. Provide all information on electrical equipment used at the facility, including transformers or other electrical equipment that may have contained polychlorinated biphenyls (PCBs).
- g. Provide information on the type(s) of oils or fluids used for lubrication of machinery or other industrial purposes, and any other chemicals or products which are or may contain hazardous substances which are or were used at the facility for facility operations.
- h. Provide any site drainage descriptions, plans or maps that include information about storm drainage which includes, but is not limited to, above or below surface piping, ditches, catch basins, manholes, and treatment/detention or related structures including outfalls. If available, also include information about connections to sanitary sewer.
- i. With respect to past site activities, please provide copies of any stormwater or drainage studies, including data from sampling, conducted at these properties. Also provide copies of any Stormwater Pollution Prevention or Maintenance Plans or Spill Plans that may have been developed for different operations during the Respondent's occupation of the property.

3. Information About Others

- a. Describe any business relationship you may have had regarding this property or operations thereon with the following entities:
 - i. Campbell, Sandra L. (Personal Representative of the Estate of Charles M. Campbell),
 - ii. Campbell, A. Talbot,
 - iii. R&A Properties LLC,
 - iv. Stanley, Alice N.,
 - v. Thompson, Robert G., and
 - vi. Thompson, Robert K.
- b. Provide the names and last known address of any other tenants or sub-lessees, the dates of their tenancy and a brief description of the activities they conducted while operating on the above mentioned site.
- c. If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents, other than

attorneys, who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous materials at, or transportation of hazardous materials to or from, the Site.

4. Financial Information

- a. Provide true and complete copies of all federal income tax documents, including all supporting schedules, for 2002, 2003, 2004, 2005, 2006 and 2007. Provide the federal Tax Identification Number and, if documentation is not available, explain why in detail.
- b. Provide the Respondent's financial interest in, control of, or that the Respondent is a beneficiary of any assets (in the U.S. or in another country) that have not been identified in your federal tax returns or other financial information to be presented to EPA. If there are such assets, please identify each asset by type of asset, estimated value, and location.
- c. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:
 - i. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site:
 - ii. the dates such relationship existed;
 - iii. the percentage of ownership of Respondent that is held by such other entity(ies);
 - iv. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;
 - v. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at the Site; and
 - vi. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.

5. <u>Insurance Coverage</u>

- a. Provide copies of all property, casualty and/or liability insurance policies, and any other insurance contracts referencing the site or facility and/or Respondent's business operations (including, but not limited to, Comprehensive General Liability, Environmental Impairment Liability, Pollution Legal Liability, Cleanup Cost Cap or Stop Loss Policies). Include, without limitation, all primary, excess, and umbrella policies which could be applicable to costs of environmental investigation and/or cleanup, and include the years such policies were in effect.
- b. If there are any such policies from question "5a" above which existed, but for which copies are not available, identify each such policy by providing as much of the following information as possible:
 - i. the name and address of each insurer and of the insured;
 - ii. the type of policy and policy numbers;
 - iii. the per occurrence policy limits of each policy; and
 - iv. the effective dates for each policy.
- c. Identify all insurance brokers or agents who placed insurance for the Respondent at any time during the period being investigated, as identified at the beginning of this request, and identify the time period during which such broker or agent acted in this regard.
- d. Identify all communication and provide all documents that evidence, refer, or relate to claims made by or on behalf of the Respondent under any insurance policy in connection with the site. Include any responses from the insurer with respect to any claims.
- e. Identify any previous settlements with any insurer in connection with the site, or for any claims for environmental liabilities during the time period under investigation. Include any policies surrendered or cancelled by the Respondent or insurer.
- f. Identify any and all insurance, accounts paid or accounting files that identify Respondent's insurance policies.
- g. Identify Respondent's policy with respect to document retention.

6. Compliance with This Request.

- a. Describe all sources reviewed or consulted in responding to this request, including, but not limited to:
 - i. the name and current job title of all individuals consulted;
 - ii. the location where all documents reviewed are currently kept.

INSTRUCTIONS

- 1. <u>Answer Each Question Completely</u>. Provide a separate answer to each question and subpart set forth in this Information Request. Incomplete, evasive, or ambiguous answers shall constitute failure to respond to this Information Request and may subject the Respondent to the penalties set out in the cover letter.
- 2. <u>Number Each Answer</u>. Number each answer with the number of the question to which it corresponds.
- 3. Provide the Best Information Available. Provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. Seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered noncompliance with this Information Request.
- 4. <u>Identify Information Sources.</u> For each question, identify all persons and documents relied upon for the answer.
- 5. Confidential Information. The information requested herein must be provided even though the Respondent may contend that it includes confidential information or trade secrets. The Respondent may assert a confidentiality claim covering part or all of the information requested, pursuant to 42 U.S.C. §§ 9604(e)(7)(E) and (F), and 40 C.F.R. § 2.203(b). All information claimed to be confidential should be contained on separate sheet(s) and should be clearly identified as "trade secret" or "proprietary" or "company confidential." A confidentiality claim should be supported by the submission of information consistent with 40 C.F.R. Part 2. Information covered by a confidentiality claim will be disclosed by EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. §§ 2.201-2.311. If no such claim accompanies the information received by EPA, it may be made available to the public by EPA without further notice.
- 6. <u>Disclosure to EPA Contractor</u>. Information submitted in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. § 2.310(h), even if the Respondent asserts that all or part of it is confidential business information. EPA may provide this information to its contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If submitting information and asserting it is entitled to treatment as confidential business information, the Respondent may comment on EPA's intended disclosure within 14 days of receiving this Information Request.

- 7. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy, should be segregated from responses, included on separate sheet(s), and marked as "Personal Privacy Information". Note, however, that unless prohibited by law, EPA may disclose this information to the general public without further notice.
- 8. <u>Objections</u>. The Respondent must provide responsive information notwithstanding objections to certain questions. To object without providing responsive information may subject Respondent to the penalties set out in the cover letter.
- 9. Privilege. If a privilege is asserted for any document responsive to this Information Request, identify (see Definitions) the document and provide the basis for assertion. If a privilege exists for only a portion of a document, provide the portion of the document that is not asserted be privileged, identify the portion that is asserted to be privileged, and provide the basis for asserting privilege. Please note that regardless of the assertion of any privilege, any facts contained in the document which are responsive to the Information Request must be disclosed in your response.
- 10. <u>Declaration</u>. The Respondent must complete the enclosed declaration, certifying the accuracy of all statements in your response.

DEFINITIONS

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in Section 101 of CERCLA, 42 U.S.C. § 9601, et seq., or Volume 40 of the Code of Federal Regulations (CFR), in which case such statutory or regulatory definitions shall apply.

The following definitions shall apply to the following words as they appear in this Enclosure:

- 1. The term "Respondent" shall mean the addressee of this Request, together with the addressee's agents, employees, and contractors.
- 2. The terms "document" and "documents" shall mean any method of recording, storing, or transmitting information. "Document" shall include, but not be limited to:
 - a. writings of any kind, including, but not limited to, any of the following:
 - i. letters, memoranda, fax transmittals;
 - ii. meeting minutes, telephone records, notebooks;
 - iii. agreements and contracts;
 - iv. reports to shareholders, management, or government agencies;
 - v. transportation manifests,
 - vi. copies of any document.
 - b. any film, photograph, or sound recording on any type of device;
 - c. 'any blueprints or drawings;
 - d. attachments to, or enclosures with, any document.
- 3. The term "identify" means, with respect to a natural person, to set forth: (a) the person's full name, (b) present or last known business and home addresses and telephone numbers; and (c) present or last known employer (include full name and address) with job title, position, or business.
- 4. The term "identify" means, with respect to a corporation, partnership, business trust, or other entity, to set forth: (a) its full name; (b) complete street address; (c) legal form (e.g., corporation, partnership, etc.); (d) the state under whose laws the entity was organized; and (e) a brief description of its business.

- 5. The term "identify" means, with respect to a document, to provide: (a) its customary business description (e.g., letter, invoice); (b) its date; (c) its number if any (e.g., invoice or purchase order number); (d) the identity of the author, addressee, and/or recipient; and (e) a summary of the substance or the subject matter. Alternatively, Respondent may provide a complete copy of the document.
- 6. The term "material" or "materials" shall mean any and all raw materials, commercial products, wastes, chemicals, substances, or matter of any kind.
- 7. The "period being investigated" and "the relevant time period" shall mean 1937 to present.
- 8. The term "property" shall mean any interest in real or personal property whatsoever, including fee interests, leases, licenses, rental, and mineral rights.
- 9. The "Site" shall mean any or all property or area described as or near 7303 8th Ave. S; and King County Tax Parcels: 2136200681 and 2136200670.
- 10. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including, but not limited to, building debris and asbestos-containing material.
- 11. The term "business activities" shall mean all actions, endeavors, ventures, or financing arrangements related in any manner whatsoever to the use and development of the Site, including surveying, sampling, grading, documentation, photography, demolition, construction, and waste disposal, and sales.

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent and that the foregoing is complete, true, and correct.

Executed on July 25, 2008.

Signature

GERALD E HENSON

Type or Print Name

Director of Introduction Systems

Title

Mailing Address:

Julie E. Dickens Registered Agent for Puget Sound Truck Lines, Inc. 600 University St. Suite 2100 Seattle, WA 98101

Miles Kaatz Puget Sound Truck Lines, Inc. 7303 8th Ave. S Seattle, WA 98108 Responses to questions on the U.S. EPA CERCLA Section 104(e) Information Request sent to:

Miles Kaatz Puget Sound Truck Lines, Inc 7303 8th Ave S Seattle, WA 98108

Dated March 25, 2008 with an extension of response deadline granted until July 25, 2008. In addition, per a conversation with Claire Hong, a further extension was granted to locate additional documents and records that were misplaced during a recent Corporate Office move to another location in late February, of 2008. Namely the additional documents would include certain invoices related to use and disposal of potentially hazardous materials and certain insurance records.

Responses to questions:

1. Respondent Information

1. a.: Puget Sound Freight Lines

P O Box 24526

3480 West Marginal Way SW

Seattle, WA 98124

1. b.: Gerald E. Henson

Director of Information Systems

Puget Sound Freight Lines

P O Box 24526

3480 West Marginal Way SW

Seattle, WA 98124 Phone: 206 623-1600 Fax: 206 621-7793

Thomas Lovejoy

Chairman

Puget Sound Freight Lines

P O Box 24526

3480 West Marginal Way SW

Seattle, WA 98124 Phone: 206 623-1600

Fax: 206 621-7793

John Bredeson

President, Puget Sound Truck Lines, Inc - Retired

P O Box 24526

3480 West Marginal Way SW

Seattle, WA 98124

Phone: 206 623-1600

Fax: 206 621-7793

Brad Lovejoy
President and CEO
Puget Sound Freight Lines
P O Box 24526
3480 West Marginal Way SW
Seattle, WA 98124
Phone: 206 623-1600
Fax: 206 621-7793

Donna Nicholas
Vice President and Controller
Puget Sound Freight Lines
P O Box 24526
3480 West Marginal Way SW
Seattle, WA 98124
Phone: 206 623-1600
Fax: 206 621-7793

Carol Harris
General Manager
Puget Sound Truck Lines, Inc.
P O Box 24526
3480 West Marginal Way SW
Seattle, WA 98124
Phone: 206 623-1600
Fax: 206 621-7793

Dan Wilson Shop Foreman Puget Sound Truck Lines, Inc. P O Box 24526 3480 West Marginal Way SW Seattle, WA 98124 Phone: 206 623-1600 Fax: 206 621-7793

Don Hiatt
Director of Maintenance
Puget Sound Truck Lines, Inc.
P O Box 24526
3480 West Marginal Way SW
Seattle, WA 98124
Phone: 206 623-1600
Fax: 206 621-7793

Miles Kaatz
Operations Manager
Puget Sound Truck Lines, Inc.
P O Box 24526
3480 West Marginal Way SW
Seattle, WA 98124

Phone: 206 623-1600 Fax: 206 621-7793

1. c.: Gerald E. Henson

Director of Information Systems
Puget Sound Freight Lines

P O Box 24526

3480 West Marginal Way SW

Seattle, WA 98124 Phone: 206 623-1600 Fax: 206 621-7793

1. d.: From July 29, 1967 until present.

1. e.: From November 21, 1967 until present.

1. f.: Puget Sound Truck Lines is a common carrier of general freight commodities in truck load quantities. This location is our Seattle area terminal housing tractors, trailers, maintenance shop, and drivers, mechanics, general, and administrative staff and offices that support operations of this terminal.

1. g.: Nothing is manufactured at this site by Puget Sound Truck Lines.

Materials used in support of the operation of this truck terminal and maintenance shop:

Fuel (#2 Diesel)

Oil and other petroleum based lubricants (Motor Oil, Transmission Oil, Gear Oil, Grease, Machine Oil, Hydraulic Oil, and the like) used in the servicing, maintenance, and repair of over the road tractors and trailers.

Coolants (Antifreeze – Nalcool and Durex)

Cleaners and cleaning supplies (battery cleaner, car wash, common household cleaners ('409', Windex, etc), hand cleaners, steam cleaning supplies, and Cooling system cleaners)

Solvents (Parts de-greaser, gasket remover)

Sealants (Windshield sealer, weather stripping, sealant foam, body sealer)

Parts (For tractor and trailer repair and maintenance)

Paint and Paint supplies (paint thinner, cans of touch-up spray paint)

Compressed Gasses (Acetylene, Argon, CO2, propane)

Batteries

Tires

Office and other miscellaneous supplies used in the day-to-day operation related to running a business.

1. h.: Neither the respondent or any subsidiaries have ever filed for bankruptcy.

2. Site Activities and Interests

- 2. a. : Copy of Lease agreements are attached and labeled. A satellite image of the lease property is attached and labeled.
- 2. b.: Property was graded and the shop/office building was constructed prior to use. We have attached invoices that document the fill and grading of the lot and installation of the storm water system. We are unable to locate any documents related to construction of the building itself.

The fill material used to prepare the lot, from the attached invoices, was "30 cubic yards oversize gravel, 593.86 cubic yards of crushed rock in place, and 168 cubic yards of pit run gravel".

The property has a total area of about 6.4 acres and, except for the office/shop building and small building in the SW corner of the property, is currently paved.

There has been no construction of or modification to any seawalls, wharves, docks, or marine ways.

- 2. c. : There has been no dredging of any kind on the property. Nor is there any future dredging planned.
- 2. d.: The property serves as a terminal for a trucking operation where, on average, about twenty (20) tractors and forty (40) trailers are parked at any one time when not on the road.

We do not load or unload any trailers nor store any of our customer's freight at this facility. From time to time we may move freight from one trailer to another in the event a trailer is damaged and in need of repair.

We do not haul hazardous materials, we are a truck load carrier of bulk commodities such as newsprint, wood pulp, beverages, tissue and paper products, appliances, mattresses, building materials, etc.

We maintain, service, and repair our tractors and trailers at an onsite, 3 bay, shop facility.

We have approximately twelve (12) managers and dispatch personnel housed in a portion of the repair shop building adjacent to and above the shop facility. The dispatch operation is staffed 24 hours per day, 7 days per week.

2. e.: Due to extenuating circumstances and per a conversation with Claire Hong on July 24, 2008 we will be delivering a complete list of vendors used and copies of all invoices within forty-five (45) days of July 25, 2008.

2. f.: The site is served by power from Seattle City Light and power is fed to the office building from power poles along S Othello St which borders the northern edge of the property.

The service is 400 amp 3-phase power. The shop/dispatch building uses standard electrical breaker panels to distribute the power once inside the building.

Seattle City Light services the facility leased by Phil's Finishing Touch, in the SE corner of the property, in the same way except the power poles are sited along 8th Ave S.

Power at this facility is distributed in the same as the shop/dispatch building using standard electrical break panels.

There is not now nor have there every been any transformers or any other electrical equipment or devices that may have contained polychlorinated biphenyls (PCBs) used at either of the buildings.

2. g.: The following is a list of oils and fluids in quantities of one (1) gallon or more used at the facility for facility operations:

Antifreeze
Hydraulic Fluid
Axle Grease
Motor Oil
Transmission fluid
Ultra Duty (lube) grease
Parts Cleaning Solvent
Diesel (#2)
Propane

There are many small quantities of, solvents, oils, spray paint in cans, and cleaners.

There are Material Safety Data Sheets (MSDS) for each of these products onsite

2. h.: See attached site drainage plan which shows Storm Drain (SD) structures including oil/water separators and Sanitary Sewer (SS) connections.

Sanitary Sewer was provided to the area as part of the "Fox Avenue" project that was completed in late 1975 and the first part of 1976. We connected to the Sanitary Sewer system in June of 1976.

2. i. : See attached copies of Site Assessment Report, Stormwater Pollution Prevention and Maintenance Plan, and copies of Stormwater Permits and Quarterly sampling DNR reports.

3. Information About Others

3. a. : All of the entities listed are members and/or representatives of the family, some deceased, from whom we lease the property. Other than the lessor/lessee relationship we nave no other business relationship with any of the entities listed.

3. b. : The following is a list of sub-lessees who have occupied the building in the SE corner of the property:

Birchfield, Inc 3740 S Union Ave P O Box 11073 Tacoma, WA 98411 Mfg corrugated metal drain pipes and we cannot find copies of the lease.

Sublease from 12-8-67 thru 8-31-68

Protective Paint Products 2107 – 47th SW Seattle, WA 98116 Do not know the nature of their business. DBA as Master Craft Paint, Inc? Sublease from 1-1-68 thru 12-31-70

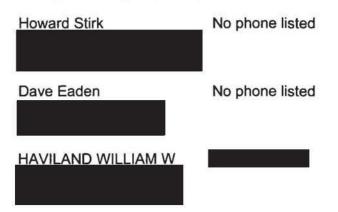
Hussmann Northwest 6000 6th Ave S Seattle, WA 98108 Division of Hussmann Refrigeration Mfg of refrigeration equipment Sublease from 10-16-68 thru 1-31-72

Protective Paint Products 2107 – 47th SW Seattle, WA 98116 Do not know the nature of their business. DBA as Master Craft Paint, Inc? Sublease from 12-1-70 thru 1-31-72

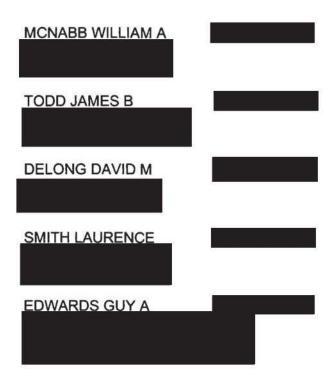
Phil's Finishing Touch 7401 8th Ave S Seattle, WA 98108 Auto body repair shop

Sublease from 4-1-87 thru present

3. c. : In addition to the those persons listed in response to Question 1. b. the following are employees and former employees that would qualify as to having knowledge regarding this site:



STEWART JOHN D	
WILSON DANIEL L	
ADAMS DAVID W	
	×
CAMPBELL PATRICK R	,
ALVAREZ F. MIGUEL A	- S
WEHRMAN RAYMOND J	
LIVINGSTON DONALD A	No phone listed
	-
LONGSTRETH CASEY J	
NIELSEN GARY W	
LUSK KENNETH J	
LOOKINENING	,
JENKINS DAVID D	
TARR STANLEY R	



4. Financial Information

 a.: Enclosed are copies of the audited financials provided by our Vice President and CFO.

These documents are extremely confidential and to be kept in the strictest confidence.

The following are the Federal Tax Identification Numbers for the respondent:

Puget Sound Freight Lines (parent)

Puget Sound Truck Lines, Inc

4. b. : Respondent has no financial interest in, control of, nor is the beneficiary of any other assets not identified in our Federal Tax Returns or other financial information provided to the EPA.

4. c. : Respondent has never been owned or controlled by, or otherwise affiliated with another corporation or entity.

5. Insurance coverage

5. a.: Enclosed are copies of all insurance policies requested.

Per a conversation with Claire Hong on June 24, 2008 we are aware of another document storage site that exists and may contain additional insurance information. Within forty-five (45) days of July 25, 2008 we will retrieve, review, and forward any additional information that we might find.

5. b.: We have not been able to find copies of certain documents and we have attached a copy of a spreadsheet which documents our insurance coverage for past years.

5. c. : The following is a list of insurance brokers we have used during the period investigated:

1967 thru 1975	Broker unknown	
1976 thru 1982	John A. Soderberg Co.	Seattle, WA
1982 thru 1989	Nasman & Associates	Seattle, WA
1989 thru 2004	Acordia Northwest, Inc	Seattle, WA
2004 to present	Wilson-Heirgood Associates	Eugene, OR

5. d.: We cannot locate any such documents but due to a recent move of our Corporate Offices we are having difficulty locating some documents.

Per a conversation with Claire Hong on June 24, 2008 we are aware of another document storage site that exists and may contain additional insurance information. Within forty-five (45) days of July 25, 2008 we will retrieve, review, and forward any additional information that we might find.

5. e.: We cannot locate any such documents but due to a recent move of our Corporate Offices we are having difficulty locating some documents.

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5. f.: We cannot locate any such documents but due to a recent move of our Corporate Offices we are having difficulty locating some documents.

Per a conversation with Claire Hong on June 24, 2008 we are aware of another document storage site that exists and may contain additional

insurance information. Within forty-five (45) days of July 25, 2008 we will retrieve, review, and forward any additional information that we might find.

- 5. g.: Our policy with regard to documentation is to retain records per governing body guidelines and requirements. With regard to insurance related records and matters, we retain information indefinitely.
- 6. Compliance with This Request
- 6. a.: i. Please refer to the list from the response to Question 1.b.
 - v. Documents reviewed are kept at:

PSFL Corporate Office 3480 West Marginal Way S Seattle, WA 98106

Puget Sound Truck Lines – Seattle 7303 8th Ave S Seattle, WA 98108

Puget Sound Truck Lines – Everett 3826 26th Place Everett, WA 98201

Iron Mountain Off-Site Storage Burien, WA